FLORIDA MUNICIPAL ATTORNEYS ASSOCIATION

FLORIDA MUNICIPAL LAW REPORTER

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Editor's Note: The following case law summaries were reported from July 1, 2009, through October 31, 2009.

Section 1. Recent Decisions of the Florida Supreme Court

EMINENT DOMAIN – PARTIAL TAKING – BUSINESS DAMAGES – WHEN A QUALIFIED PARTIAL TAKING DESTROYS A BUSINESS AT ITS PRIOR LOCATION, AND THE OWNER CHOOSES TO RELOCATE, THE RESULTING BUSINESS DAMAGES ARE MEASURED BY THE PROBABLE FINANCIAL IMPACT REASONABLY SUFFERED AS A RESULT OF THE TAKING – IF AN AFFECTED BUSINESS CHOOSES TO RELOCATE, THE RESULTING BUSINESS DAMAGES MUST BE DETERMINED IN LIGHT OF ITS CONTINUED EXISTENCE AT ITS NEW LOCATION.

In this action, the Supreme Court addressed the conflict between the 5th DCA and the 4th DCA in regards to business damage awards after partial takings through eminent domain. The conflict centered on whether the continued operation of a business at a new location should be taken into consideration when the business suffered a partial taking and was then forced to relocate. The court held that if an affected business chooses to relocate, its business damages must be determined in light of its continued existence at its new location. *System Components Corporation v. FDOT*, 34 Fla. L. Weekly S393 (Fl Sup. Ct. July 9, 2009).

ELECTIONS – INITIATIVE PETITIONS – CONSTITUTIONAL AMENDMENT – FINANCIAL IMPACT STATEMENT – PROPOSED AMENDMENT TO REQUIRE LOCAL GOVERNMENTS TO SUBMIT NEW COMPREHENSIVE LAND USE PLAN OR AN AMENDMENT TO AN EXISTING PLAN, TO A VOTE BY REFERENDUM PRIOR TO ADOPTION – FINANCIAL IMPACT STATEMENT COMPLIES WITH CHAPTER 100.371, FLORIDA STATUTES.

The Attorney General's Office requested the court review the revised financial impact statement of what is now Amendment 4. In reviewing financial impact statements, the court limits itself only to address whether the statement is clear, unambiguous, consists of no more than 75 words, and is limited to address the estimated increase or decrease in any revenues or costs to the state or local governments. The initial financial impact statement failed to comply with statute because it gave the impression the amendment wouldn't have its intended effect and the estimates were made on "purely speculative assumptions." The court held the new statement complies with statute because it no longer implies the amendment will not have its intended effect, and no longer speculates on expenses, acknowledging the cost is highly variable. *Advisory opinion to the Attorney General Re; referenda required for adoption and amendment of local government comprehensive land use plans*, 34 Fla. L. Weekly S402 (Fla. Sup. Ct. July 9, 2009).

Section 2. Recent Decisions of the Florida District Courts of Appeal

MUNICIPAL CORPORATIONS – ATTORNEY'S FEES – ERROR TO REQUIRE CITY TO PAY ATTORNEY'S FEES TO COUNSEL FOR CITY'S POLICE OFFICERS WHO OBTAINED OFFICERS' ACQUITTAL ON CHARGES OF FELONY BATTERY AND OFFICIAL MISCONDUCT IN CONNECTION WITH AN ARREST MADE IN THE LINE OF DUTY, WHERE OFFICERS FAILED TO FIRST REQUEST REPRESENTATION FROM CITY BEFORE HIRING THEIR OWN COUNSEL.

The City of Sweetwater appealed the statutory award of attorney fees for representation of two police officers that led to an acquittal on charges of felony battery and official misconduct in connection with an arrest made in the line of duty. The officers failed to initially request the city provide them counsel and instead obtained private counsel on their own. Upon the successful defense against the charges, the officers submitted their legal bills to the city for reimbursement. The city rejected the claim for fees, which led to the statutorily prescribed procedure for reimbursement. The trial court found that the officer's attorneys were entitled to reimbursement. On appeal, the 3rd DCA reversed the trial court holding that a law enforcement officer must afford the governmental entity the opportunity to provide legal representation before seeking reimbursement for legal fees. *City of Sweetwater v. Alvarez and St. Germain*, 34 Fla. L. Weekly D1293 (Fla. 3rd DCA, June 24, 2009).

Contracts – Public Procurement – Error to Declare Void as a Matter of Law a Contract Awarded by County Tax Collector's Office on Grounds that Process Used by Tax Collector Did Not Comply with Provisions of Chapters 287 and 120, Florida Statutes – Trial Court Erred in Concluding that Provisions of Chapters 287 and 120 Apply to Requests for Proposal Sent Out by Tax Collector – Tax Collector Is Not a "State Agency" that Is Part of the Executive Branch of the Government.

Dealer Tag Agency, Inc. appealed a final summary judgment of the trial court declaring void as a matter of law a contract awarded to Dealer Tag Agency, Inc. by the Hillsborough County Tax Collector's Office. Other vendors not awarded the contract filed suit alleging the tax collector's request for proposal did not comply with the requirements of Chapters 287 and 120, Florida Statutes. The trial court granted summary judgment in favor of the plaintiffs. On appeal, the court found the tax collector is a constitutional entity and is not a "state agency." Since the tax collector is not a "state agency" it is not subject to the requirements of Chapters 287 and 120, Florida Statutes. *Dealer Tag Agency, Inc., et. al. v. First Hillsborough County Auto Tag , Inc.*, 34 Fla. L. Weekly D1334 (Fla. 2nd DCA July 1, 2009).

Torts – Sheriff's – Action by Plaintiff Who, While at Residence for Non-Criminal Purpose, Was Shot in the Hand During an Exchange of Gunfire Between a Deputy and Criminal Suspect when Deputies Were Attempting to Execute Search Warrant at Suspect's Home – Error to Dismiss Claim Against Sheriff Based on Conclusion that Sheriff Did Not Owe a Legal Duty to Plaintiff Because Enforcement of a Facially Sufficient and Validly Issued Warrant Is a Duty Owed to the General Public and Not to Any Individual Person.

The plaintiff was shot in the hand by a Citrus County sheriff's deputy when the deputy exchanged gunfire with a suspect while executing a warrant on the suspect's home. The trial court dismissed the plaintiff's amended complaint against the Sheriff's Office with prejudice concluding the sheriff did not owe a legal duty of reasonable care to the plaintiff. On appeal, the plaintiff alleged the sheriff had a duty to reasonably care for her safety, and breached that duty when they failed to warn and/or protect her from the danger created by the execution of the warrant. The appeals court found when an officer seeks to enforce the law a special relationship may arise between an officer and a tort victim when the officer creates a foreseeable zone of risk. The sheriff contended even if a duty was owed to the plaintiff, he was entitled to sovereign immunity because the decision of how to execute a duly issued warrant was "discretionary" and should not be subject to tort litigation. The appeals court held sovereign immunity analysis is not based on whether the action is discretionary, but rather whether the act is a planning function. The appeals court remanded the action back to the trial court to afford the plaintiff the opportunity to file the amended complaint. *Lebance v. Dawsy*, 34 Fla. L Weekly D1362 (Fla. 5th DCA July 2, 2009).

Taxation – Homestead – "Save Our Homes" Amendment Is Valid Under U.S. Constitution and Does Not Violate Nonresidents' Rights Under Equal Protection Clause, Privilege and Immunities Clause, or Commerce Clause – 60-Day Time Period Applies Only to Action to Contest Property Assessment or Denial of Exemption and Not to Litigate Such as Instant Case Involving Validity of Tax Laws.

This action was an appeal from a final order upholding the constitutional validity of the "Save Our Homes" amendment. The plaintiffs alleged that the "Save Our Homes" amendment violated their rights under the Equal Protection, Privileges and Immunities, and Commerce clauses of the U.S. Constitution. The court held that "Save Our Homes" was valid because the tax benefit was based on the use of the property, not the status of the landowner as a resident or nonresident. *Lanning, et. al. v. Pilcher et. al.*, 34 Fla. L. Weekly D1373 (Fla. 1st DCA July 8, 2009).

Declaratory Judgment – Constitutional Law – Legislation – Challenge to Legislation that Established Office of Criminal Conflict and Civil Regional Counsel – Trial Court Properly Held that Shifts of Funding Responsibility for Certain Costs of Court-Appointed Counsel from the State to the Counties Was Unconstitutional.

With the adoption of Article V to the Florida Constitution in 1998, funding for the state's court system was shifted from the counties to the state. In 2007, the Legislature created the Office of Criminal Conflict and Civil Regional Counsel and counties were effectively mandated to pay certain constitutionally defined costs for those offices. The counties argued Article V limits the Legislature's intent and imposes the responsibility for funding the courts wholly on the state. The 1st DCA upheld the decision of the trial court holding that the cost for court-appointed counsel was unconstitutionally shifted from the state to the counties. *Lewis, et. al. v. Leon County, et. al.*, 34 Fla. L. Weekly D1446 (Fla. 1st DCA July 17, 2009).

Liens – Hospitals – Statute Which Creates a Lien in Favor of Nonprofit Charitable Hospitals in Alachua County for Costs of Hospital Care upon the Legal Claims and Settlements of Patients Treated by the Hospital, and Further Provides for Enforcement if the Lien Is Impaired, Is a Special Law Which Creates a Lien Based on a Private Contract in Violation of the Florida Constitution.

The challenged statute allowed any charitable hospital in Alachua County to place a lien on patients' assets for reasonable charges for hospital care. The Florida Constitution forbids special laws or general laws of local application that create liens based on private contracts. The hospitals argued the liens were based on a public pact with the hospital, not a private contract. The court rejected that argument because the lien attached to the assets of the patient who had a private contract with the hospital, not the public's assets. *Mercury Insurance Company of Florida, Inc. v. Shands Teaching Hospital and Clinic, Inc.*, 34 Fla. L. Weekly D1460 (Fla. 1st DCA July 21,2009).

Declaratory Judgments – Jurisdiction – Case or Controversy – Municipal Corporations – Zoning – Property Owner's Action for Declaratory Judgment Regarding Its Right to Zoning Classification that Existed when City Dissolved and Obligations and Assets Transferred to Defendant Municipal Corporation, Filed after Defendant Adopted Zoning Ordinances that Substantially Changed Permissible Uses of Plaintiff's Property.

N & D Holdings, Inc. appealed the trial court's dismissal with prejudice of its compliant for declaratory judgment against the Town of Davie. N & D owned a piece of property in Davie that was formerly located in the City of Hacienda. In 1984, Hacienda dissolved and all assets and obligations of Hacienda were transferred to Davie. In assuming all assets and obligations of Hacienda, Davie agreed to preserve all zoning requirements on property that was formerly part of Hacienda. In 2008, the Town of Davie adopted new zoning ordinances that applied to the subject property. N & D filed this action claiming the ordinance substantially changed the permissible uses of the property and were not consistent with the zoning ordinances left in place by the City of Hacienda. The 4th DCA affirmed the dismissal with prejudice of the plaintiff's claim because there was no case or controversy involving the current zoning scheme. *N & D Holding, Inc. v. Town of Davie*, 34 Fla. L. Weekly D1695 (Fla. 4th DCA August 19, 2009).

Taxation – Homestead – "Save Our Homes" Amendment Is Valid Under U.S. Constitution and Does Not Violate Nonresidents' Rights under Equal Protection Clause, Privileges and Immunities Clause, or Commerce Clause. No Merit to Contention that Trial Court Should Have Dismissed for Lack of Jurisdiction Because Action Was Not Filed Within 60 Days of the Assessment.

This was an appeal from a final order upholding the constitutional validity of the "Save Our Homes" amendment to the Florida Constitution. The plaintiffs argued that "Save Our Homes" violated their rights under the Equal Protection, Privileges and Immunities, and Commerce clauses of U.S. Constitution because it provides Florida residents unfair tax advantage nonresidents do not receive. The appeals court upheld the trial court's decision holding that "Save Our Homes" is constitutionally valid because the benefit is based on the way the property is used, not the residency status of the owner. *Lanning v. Pilcher*, 34 Fla. L. Weekly D1727 (Fla. 1st DCA August 26, 2009).

Mobile Home Parks – Eviction – Changes in Use of Land from Mobile Home Lot Rentals to Some Other Use – Municipal Corporation Was Not Required as Condition Precedent to Eviction of Residents of Mobile Home Park to Obtain Housing Study Showing that Adequate Mobile Home Parks Exist for Relocation of Mobile Home Owners.

The appellants, residents of a city owned mobile home park, asked for reconsideration of their request for declaratory and injunctive relief in which they requested the trial court find the eviction notices provided to the appellants by the city were invalid because they did not meet statutory criteria. Specifically, the appellants alleged the city did not meet the statutory precedent of obtaining a study to determine if adequate facilities exist for relocation of mobile homes. The trial court found, and the 4th DCA affirmed, the city was not required to conduct the statutory study because the city was acting in its propriety capacity and executed the eviction lawfully under Chapter 723.061, Florida Statutes. *Defalco, et. al. v. City of Hallandale Beach*, 34 Fla. L. Weekly D1801 (Fla. 4th DCA September 2, 2009).

Counties – Scope of Powers Counties – Financial Management and Reporting – Scope of Powers Exercised by Clerk of Circuit Court Acting in Capacity as County Auditor and Custodian of All County Funds – Dispute Between Board of County Commissioners and Clerk Regarding Authority of Clerk to Make Inquiries Regarding an Account Such as Checking Account for a Fire District by the County and to Obtain Custody of the Funds Contained in the Account.

This action considered questions concerning the scope of powers exercised by the clerk acting in his capacity as county auditor and custodian of all county funds. The clerk appealed the ruling of the trial court that he had no authority to investigate the status of county funds not in his custody, no authority to conduct post-payment internal audits of county expenditures, and he did not have the authority to independently prepare the county's financial statements. The 2nd DCA affirmed the trial court's decision as to the clerk not having independent authority to conduct financial audits, but reversed the trial court on the other two issues. The appeals court held, prohibiting the clerk from conducting post-payment audits and investigating the status of funds not in his possession frustrates the responsibilities of his office. *Brock v. Board of County Commissioners of Broward*, 34 Fla. L. Weekly (Fla. 2nd DCA September 23, 2009).

Torts – Counties – Sovereign Immunity – Action Seeking to Hold County Liable for a Third-Party Attack on Plaintiff by an Unknown Person While Plaintiff Waited for a Bus – County is Immune from Liability under the Public Duty and Discretionary Function Exemptions from Tort Liability.

Miami-Dade County sought to quash a trial court order denying its motion for summary judgment. Timothy Miller claimed the county was liable to him for injuries he sustained when he was attacked while waiting for a bus near a metrorail station. He claimed the county was negligent because they failed to provide adequate police protection in the area and the omission was the cause of his injuries. The county claimed they were entitled to summary judgment because the omission fell under the discretionary function and public duty exceptions. The 3rd DCA overturned the trial court holding Miller was attacked on the sidewalk, not a location traditionally subject to tort liability. No special circumstances were presented and the county did not owe Miller a special duty. The actions of the county were an exercise of its police powers and purely a governmental function, which has historically enjoyed sovereign immunity. *Miami-Dade County v. Miller*, 34 Fla. L. Weekly D1988 (Fla. 3rd DCA September 30, 2009).

Municipal Corporations – Zoning – Law of the Case – Where Circuits Court, Sitting in Appellate Capacity, Reversed Decision of City Commission Which Had Reversed Zoning Board's Decision to Grant Special Permit, and Remanded for City Commission to Conduct a Limited Review of the Record Received from the Zoning Board and to Render Finding of Fact in Support of Its Decision, the City Commission Could Not Properly Hold a De Novo Proceeding and Apply Substantive Provisions of Zoning Ordinance that Were Not in Effect at Time of Permit Application.

After reversing the decision of the Miami Zoning Board granting a special permit to the petitioner, the circuit court remanded the permit back to the City of Miami Commission holding the commission failed to follow the essential requirements of law in reversing the zoning board. The commission then held a de novo proceeding and applied zoning ordinances to the permit that were not in place at the time application was made. The commission granted the petitioner's permit, but it was subject to the petitioner agreeing to reduce the building height significantly. The petitioner then sought "first-tier" certiorari review in the circuit court seeking to quash the commission's decision and removal of the height restriction from the permit. The circuit court held the commission was permitted to conduct a de novo review and change the permit because it had amended its ordinances during the pendency of the first appeal. The "second-tier" review by the 3rd DCA found the initial circuit court decision required the city to limit its review to the record received from the zoning board and it was required to render findings of fact in support of its decision. *Dougherty v. City of Miami*, 34 Fla. L. Weekly D2047 (Fla. 3rd DCA October 7, 2009).

Municipal Corporations – Zoning – Denial of Plat Application Without Factual Findings – Certiorari – Circuit Court, Conducting Certiorari Review of Local Government's Quasi-Judicial Decision on a Development Application, May Uphold the Decision Even in the Absence of Supportive Factual Findings, So Long as the Court Can Locate Competent Substantial Evidence Consistent with the Decision.

The City of Gainesville denied the petitioner's plat application without stating its reasons in written factual findings. In the first-tier certiorari preceding the circuit court upheld the commission's decision noting competent and substantial evidence that could have supported the denial of the petitioner's application. On review the 1st DCA held when assessing the sufficiency of evidence, the circuit court need only "review the record to determine simply whether the decision is supported by competent substantial evidence." *Alachua Land Investors v. City of Gainesville*, 34 Fla. L Weekly D2163 (Fla. 1st DCA July 17, 2009).

Elections – Prohibition – Jurisdiction – Petitioner Seeking to Prohibit Florida Elections Commission from Investigating Elections Code Violation Based upon Complaint that Petitioner Alleged Was Legally Insufficient – Writ Denied.

The 4th DCA denied the petition for writ of prohibition directed to prevent the Florida Elections Commission from investigating an ethics code violation the petitioner claimed was legally insufficient. The court held the Florida Elections Commission found the complaint legally sufficient based upon the requirements of the Florida Administrative Code, and if the elections commission erroneously exercises its jurisdiction, it may be remedied on appeal. *Snipes v. Florida Elections Commission*, 34 Fla. L. Weekly D2168 (Fla. 4th DCA October 21, 2009).

Eminent Domain – Taking – Just Compensation – Applying "Condemnation Blight" Principles, Trial Court Properly Instructed Jury to Consider Highest and Best Uses in 1982, when State Began Showing an Intent to Acquire Landowner's Property – Although Actual Taking Did Not Occur until 2004, in Compensating Landowners Jury Had to Consider Effect of State's Pre-condemnation Action on Property Value – Trial Court Correctly Determined This Was Not an Inverse Condemnation Claim Because State Filed Eminent Domain Proceedings.

The Department of Environmental Protection appealed the compensation awarded to property owners by a jury. In 1982, the state showed intent to acquire the plaintiff's property for conservation purposes, but did not actually file an eminent domain action until 1995. The trial court instructed the jury to determine the fair market value of the property according to the highest and best use in 1982. On appeal, the state contended the trial court's valuation rulings authorized inverse condemnation claims outside the four-year period for filing such actions. The appeals court held the trial court properly ruled the claim was not inverse condemnation because the state filed eminent domain proceedings. Further, in compensating landowners, the jury had to consider the effect of the state's pre-condemnation action on the property value. *DEP v. West*, 34 Fla. L. Weekly D2185 (Fla. 3rd DCA October 21, 2009).

Section 3. Recent Decisions of the United States Supreme Court

Civil Rights – Racial Discrimination – Employment – Action Brought Against City by White and Hispanic Firefighters Who Did Well on Promotion Qualification Examination, Alleging They Were Discriminated Against Based on Their Race when City Discarded Examination after Examination Results Showed White Candidates Had Outperformed Minority Candidates – Race-Based Action Like the Action Taken by the City in This Case Is Impermissible under Title VII Unless Employer Can Demonstrate a Strong Basis in Evidence That, Had It Not Taken the Action, It Would Have Been Liable under the Disparate Impact Statute – Respondents Could Not Meet Threshold.

The petitioners, white and Hispanic firefighters who passed a promotion qualification exam but were denied a chance at promotions by the city's refusal to certify the test results, sued the city and respondent officials, alleging discarding the test results discriminated against them based on their race. The defendants responded had they certified the test results, they could have faced liability for adopting a practice having disparate impact on minority firefighters. The evidence indicated the city rejected the test results because the higher scoring candidates were white. Government actions to remedy past racial discrimination are constitutional only where this is a strong basis in evidence that the remedial actions were necessary. Fear of litigation alone could not justify the city's reliance on race to the detriment of individuals who passed the examinations and qualified for promotions. *Ricci, et. al. v. DeStafano*, 21 Fla. L. Weekly D1049 (U.S. Sup. Ct. June 29, 2009).

Section 4. Recent Decisions of the United States Court of Appeals, Eleventh Circuit

Speech – Political – Challenge to Florida Statutes Prohibiting Solicitation of Voters Within 100 Feet of a Polling Place – District Court Erred in Barring Enforcement of Statute – Statute Did Not Violate First Amendment by Banning Plaintiffs from Engaging in Exit Solicitation about a Non-Ballot Issue.

Plaintiff challenged the constitutionality of the prohibition in Florida law against seeking petition signatures within 100 feet of a polling place. The plaintiffs were seeking to gather signatures from voters as they left polling places in order to place a city charter amendment on a future ballot. Even though the petition in question related to nothing on the ballot, elections officials in accordance with state law, prevented the signature gatherers from operating within 100 feet of polling places. The plaintiffs sought declaratory and injunctive relief and asked the trial court to declare the Florida law unconstitutional as it applied to the plaintiffs' exit solicitation activities. The district court held the Florida law probably violated the plaintiffs' free speech rights and the state showed little evidence that the prohibition of exit solicitation served compelling interest or that it was sufficiently drawn to achieve that end. The appeals court reversed the trial court holding that preserving the integrity of the election process was a compelling interest and the law does not significantly impinge on constitutionally protected rights. *Citizens for Police Accountability Political Committee, et. al. v. Browning*, 21 Fla. L. Weekly Fed. 1941 (11th Cir. June 25, 2009).

Civil Rights – Law Enforcement Officers – Excessive Force – Deliberate Indifference – Use of Deadly Force by Police Officers Responding to Call of Suicidal Armed Man – Qualified Immunity – Officers' Use of Force in Dealing with Armed and Potentially Suicidal Individual Was Reasonable in This Case.

The estate of John Garczynski appealed a trial court's grant of summary judgment in favor of the Palm Beach County Sheriff's Office (PBSO) and several deputies in their individual capacity. Garczynski's estate filed suit claiming his rights under the Fourth and Fourteenth amendments were violated, assault and battery, and negligence after Garczynski was shot and killed by PBSO deputies. Leigh Garczynski, Garczynski's soon to be ex-wife, called PBSO and reported that she believed Garczynski was armed and suicidal. Leigh then worked with the PBSO to locate Garczynski and direct deputies to his location. There was miscommunication with deputies that were directed to

Garczynski's location that resulted in Garczynski acting in a manner that caused the deputies to feel threatened. In response, the deputies shot and killed Garczynski. The trial court held, and 11th circuit affirmed, the deputies' actions were objectively reasonable under all of the circumstances. *Garczynski v. Bradshaw, et. al.*, 21 Fla. L. Weekly Fed. 1995 (11th Cir. July 7, 2009).

Section 5. Recent Decisions of the United States District Courts for Florida

Torts – Defamation – Counties – School Boards – Privilege – Action Against School Board and Elected Member of Board Based on Alleged Defamatory Statements Made at School Board Meetings and to the Media Regarding Plaintiff, Who Was Terminated from Her Position as "School Board Attorney" for Alleged Misconduct in Accepting Moving Expenses Allowance, Although She Never Moved.

Marta Perez, the defendant, allegedly made statements as a member of the Miami-Dade School Board claiming that Julieann Rico, the plaintiff, was dishonest and a thief. The statements were made in connection to the plaintiff accepting a moving allowance to serve as the "school board attorney" and never actually moving. The defendant moved for a dismissal with prejudice on the grounds that she was absolutely privileged to make the statements, and the statements were not actionable because they were purely opinion. The plaintiff responded that Perez had no affirmative duty to make statements, she had no privilege for statements she made relating to a Bar grievance outside of the Bar grievance process, and her statements were "mixed opinion," therefore actionable. The court held the statements made by the defendant were made in connection with her performance of her official duties and granted her motion to dismiss. *Rico v. School Board of Miami-Dade County Public Schools*, 22 Fla. L. Weekly Fed. D54 (Southern District September 17, 2009).

Section 6. Announcements

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- July 21-23, 2011 – The Breakers, Palm Beach

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